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7 Attorneys for Defendant
8 WYNN LAS VEGAS, LLC

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA
11

12 TIARE RAMIREZ, an individual,

13 Plaintiff,

14 vs.

15 WYNN LAS VEGAS, LLC; DOES I
16 through X; and ROE Corporations XI
through XX, inclusive,

17 Defendant.
18

Case No. 2:19-cv-01174-APG-EJY

**STIPULATION AND ORDER TO
CONTINUE TRIAL**

(FIRST REQUEST)

19 Pursuant to LR IA 6-1 and IA 6-2, and LR 7-1 and 26-3, Defendant WYNN LAS VEGAS,
20 LLC, and Plaintiff TIARE RAMIREZ, by and through their respective attorneys of record, hereby
21 stipulate to continue the trial, which is currently scheduled for the stacked calendar of December 4,
22 2023, for at least sixty (60) days to a date convenient to the Court. This is the first request for an
23 extension to continue the trial. The requested extension is sought in good faith and not for purposes of
24 delay.

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Per the Joint Pretrial Order, (ECF No. 92), the parties have conferred with our respective clients and each other, and stipulate and agree that this case will not be ready for the December 4, 2023 trial stack.

Specifically, Plaintiff's counsel has a firm trial setting in the matter of *Finucan v. City of Las Vegas et al.*, Case No. 2:21-cv-00198-CDS-DJA, for the same trial stack of December 4, 2023, that Plaintiff's counsel anticipates will move forward.¹ Specifically, Plaintiff's counsel already participated in a Master Trial Scheduling Conference for that matter on September 5, 2023, (*see Finucan*, 2:21-cv-00198-CDS-DJA, ECF No. 40), and there, Judge Silva made it clear to the parties that they are proceeding to trial, which was set for the December 4, 2023 trial stack, (*id.* at ECF No. 46). Therefore, the parties request that the currently scheduled trial dates be continued at least sixty (60) days to a time convenient for the Court to account for this conflict and the upcoming holidays.

Dated: November 3, 2023

Respectfully submitted,

/s/ Christian Gabroy

CHRISTIAN GABROY, ESQ.
KAINE MESSER, ESQ.
GABROY | MESSER

Attorney for Plaintiff

Dated: November 3, 2023

Respectfully submitted,



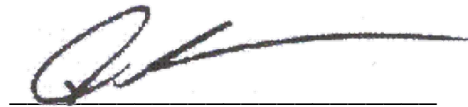
WENDY M. KRINCEK, ESQ.
KELSEY E. STEGALL, ESQ.
LITTLER MENDELSON, P.C.

Attorneys for Defendant
ORDER

Trial currently scheduled for December 4, 2023 is vacated and continued to April 8, 2024 at 9:00 a.m. Calendar call is continued to April 2, 2024 at 9:00 a.m. Status conference scheduled for March 19, 2024 at 9:00 a.m. All in courtroom 6C.

IT IS SO ORDERED:

Dated: November 6, 2023



ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE

¹ While not presenting a conflict with the current trial date, Defense counsel has a matter currently scheduled for arbitration on February 5 through 7, 2024. There is a pending request to reschedule that arbitration proceeding to a new date due to a conflict with the current dates. Counsel for Defendant wishes to inform the Court of this circumstance as there is the potential that a new trial date in February 2024 could conflict with an arbitration date that same month, in which case, the parties may request an alternate trial date.